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October 27, 2010

Christopher Hughey
Acting General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20453

Re: MUR 6384

Dear Mr Hughey:

The Respondents, Michael Schwab, Chairman of the San Mateo County Republican Central Committee (Federal) and its current Treasurer, Mr. Leif Lea, file the following response to the Complaint filed by former Treasurer, Angini Kumar.

The Respondents request that no further action be taken by the Commission in this matter.

The Complaint arose from an internal political party dispute involving the committee leadership and the committee's two former treasurers. The first of these Treasurers, Mrs. Elsie Gufler, was elected First Vice Chairman of the San Mateo County Republican Central Committee in April 2010, and according to its bylaws, was prohibited from holding the earlier attained of her two party offices, the office of Treasurer. The second of these treasurers, a political ally of the first ~~former~~ Treasurer, unfortunately has attempted literally to make not only a "federal case" of our internal dispute, but has also filed complaints with the State Attorney General and the State Fair Political Practices Commission. Neither of those state agencies has taken any action to date, and neither is likely to do so.

The critical question is whether the Committee's campaign reports accurately reflect the Committee's federal campaign activity, its receipts and expenditures. They do.

While the original controversy led the first former Treasurer to refuse to make the necessary accommodations to obtain full and complete information for the Committee's May 2010 monthly report (see Declaration of Michael Schwab), and that report initially as filed did not reflect full and complete information, it was amended forthwith, and fully, to be accurate and complete. This situation caused the Committee's professional reports preparer to decline to assist due to the apparent internal conflicts. Subsequent to the events cited in the Complaint and in the Declaration of Chairman Michael Schwab, a new treasurer has been installed, and the

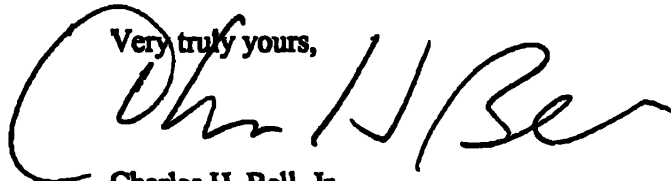
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professional reports preparer has been satisfied that the internal situation will not cause any interference in her ability to assist the Committee in preparing its campaign reports. None of the subsequent reports filed by the current Treasurer are incomplete or incorrect (see Declaration of Kelly Lawler.) Nothing in the activity subsequently amended on the May 2010 monthly report affected a particular federal election. The Committee did not engage in any direct federal candidate support during that time period.

The San Mateo County Republican Central Committee regrets that this internal dispute has led to the Complaints in question, and that it has required the Committee to hire counsel and pay costs related to responding to groundless complaints. It has detracted from the Committee's ability and focus on the November 2010 election. In the future, the Committee will take steps promptly to resolve any internal disputes involving the treasurer that might affect its ability to file timely and accurate campaign reports.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ch H Bell", written over a large, loopy circular flourish.

Charles H. Bell, Jr.
Designated Counsel

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